Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 92-77
Billed Party Preference for 0+ InterLATA Calls	)	
	)	
In the Matter of	)	
	)	
Disclosures by Operator Service Providers Serving Public Phones	)	RM-8606

COMMENTS OF SPRINT CORPORATION

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036
(202) 857-1030

Its Attorneys

April 12, 1995

TABLE OF CONTENTS

SUMMARY

The proposal of the National Association of Attorneys General et al. to require additional disclosures by operator service providers whose rates exceed those of the dominant carrier is well-intentioned, but ultimately inadequate. It treats the symptoms, rather than the root cause, of the problems its seeks to cure. So long as competition for calls from public phones is driven by commission payments to aggregators, rather than by providing economical service to consumers, there is an inherent incentive for carriers to charge as much as possible in order to maximize the commission payments they can make. Ultimately, the only way to curb this behavior is by mandating billed party preference. If, as the investigations by the attorneys general reveal, there is widespread failure to comply with existing Commission rules governing operator service providers, there is little reason to suppose that the disclosure requirement they seek would be adhered to, either.

The rate "ceiling" proposed by CompTel et al. as an alternative to billed party preference would not be effective in curbing unreasonably high rates and would not substitute for the many other benefits of billed party preference, which include allowing all consumers to reach their preferred carrier simply by dialing "0+," thereby putting medium and

small long distance carriers on an equal competitive footing with AT&T.

The proposed "ceiling" itself is seriously flawed. To begin with, the "ceiling" rates are too high, ranging as much as three times what Sprint charges, depending on the type of call and time of day. In addition, the "ceiling" isn't even a ceiling. No carrier would be compelled to charge rates at or below the ceiling. Instead, the "ceiling" would simply be a tripwire for reporting purposes, allowing carriers charging rates above the ceiling to have an opportunity to justify their rates if called upon to do so by the Commission. The implicit assumption that a carrier is entitled to charge higher-than-competitive rates if its own costs are high is contradicted by nearly 60 years of consistent Commission policy on rate regulation in a competitive market, which holds that rates should be based on the costs of the lowest-cost large carrier, not those of the highest-cost carrier or even the industry average.

Furthermore, since there are hundreds or perhaps thousands of operator service providers, there is no hope that the Commission could effectively enforce any rate ceiling. The far better course of action is to eliminate the underlying incentive to charge high rates and adopt a system of billed party preference, which will focus competition on providing high quality service at a reasonable cost to consumers.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Billed Party Preference for 0+ InterLATA Calls	)	CC Docket No. 92-77
	)	
In the Matter of	)	
	)	
Disclosures by Operator Service Providers Serving Public Phones	)	RM-8606
	)	

COMMENTS OF SPRINT CORPORATION

In a public notice released March 13, 1995 (DA 95-473), the Commission has asked for consolidated comments on a petition for rulemaking filed February 8, 1995 by the National Association of Attorneys General et al. ("NAAG") (RM-8606), and a March 7, 1995 ex parte submission filed by CompTel et al. (hereinafter "CompTel") in the Billed Party Preference docket. In its petition, NAAG requests the Commission to adopt a rule, unless or until billed party preference is adopted, that would require additional disclosures to the public by operator service providers whose rates exceed those of the dominant carrier, while CompTel, in its ex parte, proposes what it terms a rate "ceiling" on operator services calls that it seeks to have the Commission adopt in lieu of billed party preference. As will be discussed below, Sprint views the NAAG's proposal as a well-intentioned, but

ultimately inadequate, proposal that addresses symptoms, but not the root cause, of the present operator services environment, while the CompTel proposal would not even treat the symptoms of the problem, but instead would in effect pronounce a sick patient "fully recovered."

I. NAAG'S PROPOSAL IS UNLIKELY TO BE AN EFFECTIVE CURE FOR EXCESSIVE CHARGES TO THE PUBLIC

In its petition, NAAG expresses concern about the abuse of many consumers who make calls from payphones and other public phones. NAAG refers to consumer complaints of being charged as much as ten times the charges imposed by full service carriers, and investigations showing widespread violations of Commission rules requiring OSPs to clearly identify themselves, mandating disclosure of the identity of the presubscribed OSP on payphones, and prohibiting blocking of dial-around access to the consumers' preferred carriers. Even in instances where the OSP is clearly identified, NAAG contends that consumers expect the cost of the call to be reasonable and are unaware that they could wind up paying several times their regular carrier's charges.

NAAG states (at 5) that implementation of billed party preference may resolve this problem, but argues that because of the lengthy implementation period for BPP, some action must be taken in the meantime. To that end, NAAG proposes adoption of a rule that would require any carrier whose rates

(including all surcharges and fees) exceed those of the dominant carrier to include the following message during call set-up:

> This may not be your regular telephone company and you may be charged more than your regular telephone company would charge for this call. To find out how to contact your regular telephone company call 1-800-555-1212.

While Sprint sympathizes with the ultimate objective of NAAG, the difficulty with its proposal is that it treats the symptoms, not the root cause, of problems that exist in the operator services environment today. So long as competition for traffic from public phones is driven by commission payments to aggregators, rather than by providing economical service to consumers, there is an inherent incentive for carriers to charge as much as possible to consumers, in order to maximize their commission payments to public phone aggregators. Ultimately, the only way to curb this behavior is by mandating billed party preference, so that consumers, not aggregators, govern the selection of carriers. This would refocus the carriers' competitive incentives on offering the best possible service to consumers at the lowest possible price.

Sprint is skeptical as to the efficacy of the stop-gap solution proposed by NAAG, well-intentioned though it is. If, as NAAG claims, there is widespread non-compliance with

existing disclosure rules (and Sprint does not doubt that this is the case), there is no reason to suppose that a rule prescribing yet another disclosure would be complied with either. Under the present industry structure, there are literally hundreds or even thousands of operator service providers: any private payphone provider that utilizes payphones with store-and-forward technology is an operator service provider as well. As a result, the practical difficulties of enforcing such a requirement, given the Commission's limited staff, are enormous.

II. COMPTEL'S POROUS RATE CEILING WOULD ALLOW COMMISSION-SANCTIONED OVER-CHARGING OF THE PUBLIC AND WOULD NOT SUBSTITUTE FOR BILLED PARTY PREFERENCE

CompTel's proposal differs from NAAG's in two critical respects: (1) it, unlike NAAG, claims that its proposal is an adequate substitute for billed party preference; and (2) CompTel's proposal fails to treat even the symptoms of the present environment. Instead, CompTel is merely offering the Commission a fig leaf -- a pretense that a continuing problem would be "solved."

CompTel offers a porous rate ceiling[1] as a complete substitute for billed party preference, based on its view (at

[1] Sprint refers to CompTel's ceiling as porous because, as will be discussed below, CompTel does not contemplate that any carrier would be required to charge rates at or below the ceiling.

5) that the high rates charged by alternative operator service providers are "the only lingering concern...."[2] However, excessive charges are not the only problem in the existing industry structure that billed party preference is designed to combat. The other benefits of BPP were discussed at length in the Commission's Further Notice of Proposed Rulemaking in this docket.[3] Among other things, the Commission observed that billed party preference would eliminate the need for consumers to dial lengthy access codes in order to reach their preferred operator service provider (id. at 3322-23); that competitors of AT&T would be able to offer end-users the same 0+ access as AT&T (id. at 3324); and that billed party preference would reduce regulatory costs both by eliminating consumer complaints and by making possible a further streamlining of its regulation of AT&T once AT&T's existing advantages are eliminated, and would reduce the costs of collection and uncollectables (id. at 3324-25).

---

[2] In commenting on CompTel's proposal, Sprint is focusing on the so-called rate ceiling, and not its erroneous assertions that BPP is too costly to implement, that consumers are content to dial extra digits to reach their carrier of choice, and that the Commission's unblocking and disclosure rules have solved the remaining operator services problems. These assertions have been dealt with at length and in detail in Sprint's comments and reply comments in response to the Further Notice as well as in several ex parte submissions placed on the record by Sprint subsequent to the end of the comment cycle. Furthermore, the NAAG petition amply demonstrates that blocked access codes and unbranded calls continue to remain a problem.

[3] 9 FCC Rcd 3320 (1994).

While preventing the overcharging of consumers that takes place today is clearly an important benefit from billed party preference, these other benefits are quite substantial as well. From Sprint's perspective, it is particularly important to end the one remaining advantage that AT&T inherited from its pre-divestiture monopoly relationship with the BOCs. Its large base of presubscribed phones and its inherited calling card base make it the only carrier that can instruct its calling card customers to dial on a 0+ basis. As a result, AT&T can offer its customers a convenience in its calling card product that no other IXC can match. Large numbers of 1+ customers of Sprint and other carriers continue to use AT&T calling cards because of their greater ease of use. This advantage leverages beyond the calling card and operator service market segments into AT&T's penetration of the 1+ residential and business market as well: customers have a perception that AT&T's service package as a whole is more convenient to use than those of other carriers. Billed party preference is needed to bring the same marketplace equality for operator services that equal access brought for directly dialed calls.[4]

---

[4] CompTel (at 1) persists in its claim -- rejected as irrelevant by the Commission in the Further Notice (9 FCC Rcd n.18 at 3322) -- that BPP would affect the routing of less than 20% of operator assisted calls. This is akin to saying that equal access should never have been implemented, because it only affected the routing of less than 10% of direct-dialed

Even if it were true, as CompTel claims, that high rates are the only problem with the present operator services environment, the porous rate ceiling advocated by CompTel is far from an adequate solution. To begin with, the rates used in the "ceiling" are too high -- far too high in the case of calling card calls. (Such calls accounted for more than 95% of all of the operator service calls Sprint handled in February 1995.) The table on the following page compares CompTel's ceiling with Sprint's current baseline rates for various types of calls.[5] As the table shows, in virtually all cases, the proposed "ceiling" rates are higher than those charged by Sprint.[6] CompTel's rates for a one-minute calling card call are more than three times what Sprint charges, and CompTel's rates for a nine-minute calling card call range from 183% of Sprint's charges (daytime) to 255% of Sprint's charges (night/weekend calling period). Thus, even if CompTel's

---

calls (AT&T's market share at divestiture was in excess of 90%).

[5] In order to be generous to CompTel, whose ceiling rates are distance-insensitive, Sprint chose a 3,000 mile distance for purposes of calculating its rates. Sprint's rates for short distances are even lower. Sprint believes its baseline rates are closely comparable with those charged by other major operator service providers such as AT&T and MCI. It may be noted that one of Sprint's discount plans -- Sprint Worldwide -- includes discounts of up to 20% for calling card and operator services calls.

[6] The only exception is a one minute person-to-person call in the daytime period for which Sprint's charge exceeds the CompTel "ceiling" by 6 cents.

Comparison of Proposed Ceiling With Sprint's Rates[1]

Duration (Minute)	Collect, Calling Card, Third Party				Person-to-Person	
	Comptel	Sprint			Comptel	Sprint
		FonCARD	Collect	3d No.		
1	3.75	D 1.18 E 1.11 N 1.06	D 2.41 E 2.35 N 2.30	D 2.51 E 2.45 N 2.40	4.75	D 4.81 E 4.75 N 4.70
2	4.25	D 1.51 E 1.37 N 1.27	D 2.72 E 2.60 N 2.50	D 2.82 E 2.70 N 2.60	5.25	D 5.12 E 5.00 N 4.90
3	4.75	D 1.84 E 1.63 N 1.48	D 3.03 E 2.85 N 2.70	D 3.13 E 2.95 N 2.80	5.75	D 5.43 E 5.25 N 5.10
4	5.25	D 2.17 E 1.89 N 1.69	D 3.34 E 3.10 N 2.90	D 3.44 E 3.20 N 3.00	6.25	D 5.74 E 5.50 N 5.30
5	5.50	D 2.50 E 2.15 N 1.90	D 3.65 E 3.35 N 3.10	D 3.75 E 3.45 N 3.20	6.50	D 6.05 E 5.75 N 5.50
6	5.95	D 2.83 E 2.41 N 2.11	D 3.96 E 3.60 N 3.30	D 4.06 E 3.70 N 3.40	6.95	D 6.36 E 6.00 N 5.70
7	6.20	D 3.16 E 2.67 N 2.32	D 4.27 E 3.85 N 3.50	D 4.37 E 3.95 N 3.60	7.20	D 6.67 E 6.25 N 5.90
8	6.65	D 3.49 E 2.93 N 2.53	D 4.58 E 4.10 N 3.70	D 4.68 E 4.20 N 3.80	7.65	D 6.98 E 6.50 N 6.10
9	7.00	D 3.82 E 3.19 N 2.74	D 4.89 E 4.35 N 3.90	D 4.99 E 4.45 N 4.00	8.00	D 7.29 E 6.75 N 6.30

[1] Assumes 3,000 mile distance.

"ceiling" were a genuine ceiling (and as discussed next, it is not) the proposed charges are far too high.

Furthermore, the "ceiling" isn't really a ceiling. Nothing in the CompTel proposal would bind any carrier to charging rates that are at or below the ceiling.[7] Instead, the ceiling would simply be a tripwire for reporting purposes, allowing carriers charging rates above the ceiling to have an opportunity to explain or justify the rates being charged if called upon to do so by the Commission (see Ex parte at 8-9).[8]

The suggestion that rates that far exceed those of the

---

[7] The fact that the proposed "ceiling" would not be binding is evidence that at least some of the proponents of the "ceiling" intend to charge rates that exceed the "ceiling."

[8] CompTel proposes (id.) to place this reporting obligation on the LECs. There are several problems with this proposal. First, LECs may not bill for all calls of all OSPs. OSPs and billing clearinghouses have the capability to bill directly, and some do so. Thus, carriers whose rates are above the "ceiling" could avoid any reporting of their excessive rates simply by bypassing the LECs for billing and collection. Second, if the OSP's billing data are submitted to the LEC in the form of a text file (which is one option the Sprint LECs' billing and collection customers are requesting), it would be impossible to screen the OSP's charges (except by an expensive manual examination). Third, even if the OSP submitted its billing data in a data file, the screening would have to be performed in a post-billing run so as not to delay the rendering of bills to consumers. Fourth, the LECs wold have no way of ascertaining whether the billing data submitted by the OSP have been manipulated (e.g., by showing an artificially long call duration) to make an above-"ceiling" charge appear to fall below the "ceiling." In any case, while the Sprint LECs have no way of estimating all the costs involved, it is by no means clear that they would be minimal. Any such costs should be borne by OSPs whose rates exceed the "ceiling," since they are the only OSPs responsible for causation of these expenses.

major operator service providers could be adequately explained or justified flies in the face of more than a half century of Commission policy on rate regulation in a competitive environment. As early as 1938, the Commission rejected the notion that each carrier in a competitive market is entitled to charge rates that are fully compensatory to itself:[9]

> We are under no duty to fix rates for domestic telegraph service so that all carriers engaged therein may earn a fair return on the fair value of their property devoted to that service or even make some profit on their operations.

This view is reaffirmed a decade later:[10]

> The rate increases which we will now permit may fall short of producing a fair return for the international telegraph communications industry as a whole, and for certain of the carriers. Contrary, however, to the contentions made by the American Cable and Radio group of companies, the Commission does not consider that it is obliged by the Communications Act to fix international telegraph rates so as to meet the over-all requirements of the industry as whole.

Following this same policy yet another decade later, the Commission explained why rates in a competitive market should not be based even on industry average costs:[11]

---

[9] Postal Telegraph-Cable Company et al., 5 FCC 524, 527 (1938).

[10] Charges for Communications Service Between the United States and Overseas and Foreign Points, 12 FCC 29, 62 (1947).

[11] The Western Union Telegraph Co., 25 FCC 535, 580 (1958) (footnote omitted).

> This is so because the adoption industry wide approach would, by averaging the requirements of competitors, deprive the public of the opportunity for rate benefits which were one of the reasons for introducing competition in the first place. An industry approach to ratemaking is in effect a guarantee to the less competent or less efficient operator that his failure to measure up in the competitive rates will be rewarded. The industry approach would thus serve to deprive the public of the benefit of competition ratewise.

Instead, the Commission reiterated its previous policy that it should fix rates no higher than necessary to "enable a sufficiently large segment of the industry to earn a fair rate of return" (id. at 581, footnote omitted). For this purpose the Commission focused on a "bellwether" carrier -- a carrier sufficiently large to constitute "a substantial segment of the industry" that had the highest reported earnings (id. at 581-83).[12] This bellwether concept continued to be embraced by the Commission into the 1980's, before sufficient competition emerged in those markets to supplant the need for rate regulation.[13]

Based on these long-standing policies, there is no warrant for a regulatory approach as CompTel has proposed, which would permit a price "ceiling" to be set above the rates

---

[12] The carrier chosen in that case had a market share of 33% (id. at 582).

[13] See, ITT World Communications, Inc., 82 FCC 2d 282, 285-86 (1980); and 85 FCC 2d 561, 567 (1981).

charged by the dominant carrier and indeed which would permit "explanation and justification" of rates even higher than the ceiling rates. If the alternative operator service providers cannot offer service to the public at rates equal to those of the full-service industry, the Commission must question whether their existence serves the public interest. As the Commission emphasized in 1958, competition is supposed to benefit the public in the form of lower rates. The alternative operator service providers can persist in charging higher than competitive rates only because customers don't know who they are dealing with, cannot reach the carriers they prefer to deal with, or are at least momentarily captive of the presubscribed carrier. It is the Commission's continuing duty to take effective action to step in to protect the public when the marketplace, left to its own devices, has failed, as it clearly has here. The fig leaf of a porous rate ceiling is not effective action.

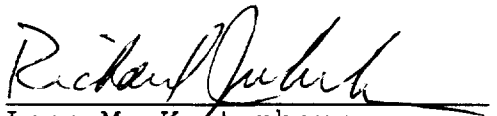
Furthermore, for reasons explained in Sprint's September 14, 1994 Reply Comments (at 54-59), it does not believe any rate ceiling approach can be effectively enforced. As noted above, there are literally hundreds or thousands of operator service providers, and the Commission simply lacks the resources to effectively monitor and enforce a rate ceiling. What the Commission can do is recognize that the rate abuses that are now taking place are an inherent byproduct of the

economic incentives in the current industry structure. A payphone provider/OSP can maximize its income by charging high rates, and OSPs can win more presubscription business by paying higher commissions to premises owners that the high rates will finance.

The most effective way to regulate is to make sure that the industry has the incentive to compete on the basis of price and quality of service to the public, and the Commission can do so only by mandating billed party preference.

Respectfully submitted,

SPRINT CORPORATION

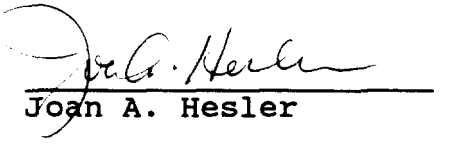


Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, N.W. 11th Floor
Washington, D.C. 20036
(202) 857-1030

April 12, 1995

CERTIFICATE OF SERVICE

I, Joan A. Hesler, hereby certify that on this 12th day of April, 1995, a true copy of the foregoing **COMMENTS OF SPRINT CORPORATION**, in the matter of Billed Party Preference for 0+ InterLATA Calls, CC Docket No. 92-77, was served U.S. First Class Mail, Postage Prepaid, or Hand Delivered, upon each of the parties listed below.



Joan A. Hesler

Kathleen M. H. Wallman, Chief
Common Carrier Bureau
Federal Communications Comm.
1919 M Street, N.W., Rm. 500
Washington, D.C. 20554

Kathleen B. Levitz, Deputy
Bureau Chief (Policy)
Federal Communications Comm.
1919 M Street, N.W., Rm. 500
Washington, D.C. 20554

James Schlichting
Chief, Policy & Planning
Federal Communications Comm.
1919 M Street, N.W., Rm. 544
Washington, D.C. 20554

International Transcription
Service*
1919 M Street, N.W.
Washington, D.C. 20554

Karen Brinkman
Special Asst. to the Chairman
Room 814
Federal Communications Comm.
1919 M Street, N.W.,
Washington, D.C. 20554

Mark Nadel
Policy & Program Planning
Division
Federal Communications Comm.
1919 M Street, N.W., Rm. 544
Washington, D.C. 20554

Rudy Baca
Legal Advisor
Office of Commissioner Quello
Room 802
Federal Communications Comm.
1919 M Street, N.W.,
Washington, D.C. 20554

James Colthart
Special Advisor
Office of Commissioner Barrett
Room 826
Federal Communications Comm.
1919 M Street, N.W.
Washington, D.C. 20554

Richard Welch
Legal Advisor
Office of Commissioner Chong
Room 844
Federal Communications Comm.
1919 M Street, N.W.,
Washington, D.C. 20554

James Casserly
Special Advisor
Office of Commissioner Ness
Room 832
Federal Communications Comm.
1919 M Street, N.W.
Washington, D.C. 20554

Mary Beth Richards
Deputy Bureau Chief, Room 500
Federal Communications Comm.
1919 M Street, N.W.,
Washington, D.C. 20554

Susan Lewis Sallet
Room 500
Federal Communications Comm.
1919 M Street, N.W.
Washington, D.C. 20554

Robert Spangler
Common Carrier Bureau
Room 6206
Federal Communications Comm.
2025 19th Street, N.W.
Washington, D.C. 20554

Thomas Wyatt
Common Carrier Bureau
Room 107
Federal Communications Comm.
1250 23rd Street, N.W.
Washington, D.C. 20554

Adrien Auger
Common Carrier Bureau
Room 114
Federal Communications Comm.
1250 23rd Street, N.W.
Washington, D.C. 20554

Genevieve Morelli
COMPTEL
Connecticut Avenue, N.W.
Washington, D.C. 20036

Frank M. Panek
John T. Lenahan
Larry A. Peck
AMERITECH OPERATING
COMPANIES
2000 W. Ameritech Ctr. Dr.
Room 4H86
Hoffman Estates, IL 60196-1025

Edward D. Young, III
John M. Goodman
Attorneys for the BELL ATLANTIC
TELEPHONE COMPANIES
1710 H Street, N.W.
Washington, D.C. 20006

Gail L. Polivy
GTE SERVICE CORPORATION
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Edward R. Wholl
William J. Balcerski
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
Attorneys for BELLSOUTH
TELECOMMUNICATIONS, INC.
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, GA 30367-6000

James P. Tuthill
Nancy C. Woolf
Attorneys for PACIFIC BELL
& NEVADA BELL
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

James L. Wurtz
Attorney for PACIFIC BELL
& NEVADA BELL
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Robert M. Lynch
Richard C. Hartgrove
John Paul Walters, Jr.
Attorneys of SOUTHWESTERN
BELL TELEPHONE COMPANY
1010 Pine Street, Room 2114
St. Louis, MO 63101

Lawrence E. Sarjeant
Attorney for U.S. WEST
COMMUNICATIONS, INC.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Mary J. Sisak
Donald J. Elardo
MCI TELECOMMUNINCATINS CORP.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Mark C. Rosenblum
Peter H. Jacoby
Richard H. Rubin
Attorneys for AMERICAN
& TELEGRAPH COMPANY
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Debra Berlin
Executive Director
NASUCA
1133 15th Street, N.W.
Suite 575
Washington, D.C. 20005

David B. Jeppson
Albert H. Kramer
Robert F. Aldrich
KECK, MAHIN & CATE
1201 New York Ave., N.W.
Washington, D.C. 20005-3919
Attorneys of American Public
Communications Counsel &
INMATE CALLING SERVICES
PROVIDERS TASK FORCE

Daniel J. Rooks
4250 Blackland Drive
Marietta, GA 30067

Mary MacDermott
Linda Kent
UNITED STATES TELEPHONE ASSN.
1491 H Street, N.W.
Suite 600
Washington, D.C. 20005

Eugene F. Mullin
Christopher A. Holt
Mullin, Rhyne, Emmons
and Topol, P.C.
1225 Connecticut Ave., N.W.
Suite 300
Washington, D.C. 20036
Counsel for CITIZENS UNITED FOR
REHABILITATION OF ERRANTS

Lisa M. Zaina
General Counsel
ORGANIZATION FOR THE PROTEC-
TION & ADVANCEMENT OF
Small Telephone Companies
2000 K Street, N.W., #205
Washington, D.C. 20006

Douglas F. Brent
Associate Counsel
ADVANCED TELECOMMUNICATIONS
CORPORATION
9300 Shelbyville Road, #700
Louisville, KY 40222

Catherine R. Sloan
Vice President, Fed. Affairs
LDDS COMMUNICATIONS, INC.
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Greg Casey
Jane A. Fisher
INTERNATIONAL TELECHARGE, INC.
6707 Democracy Boulevard
Bethesda, MD 20817

Danny E. Adams
Rachel J. Rothstein
WILEY, REIN & FELDING
1776 K Street, N.W.
Washington, D.C. 20006

Trudi J. Renwick, Ph.D.
PUBLIC UTILITY LAW PROJECT
OF NEW YORK
Pieter Schuyler Financial Ctr.
39 Columbia Street
Albany, NY 12207

Ian D. Volner
Cohn & Marks
Suite 600
1333 New Hampshire Ave., N.W.
Washington, D.C. 20036
Counsel for AIRPORTS ASSN.
COUNSEL INTERNATIONAL,
NORTH AMERICA

Greg S. Sayre
RCI LONG DISTANCE, INC.
Rochester Tel Center
180 South Clinton Avenue
Rochester, NY 14646

Charles P. Miller
General Counsel
VALUE-ADDED COMMUNICATIONS
INC.
1901 South Meyers Road #530
Oakbrook Terrace, IL 60181

James E. Lewis
P.O. Box 689
Ely, NV 89301

William M. Barvick
MIDWEST INDEPENDENT COIN
PAYPHONE ASSOCIATION
240 E. High Street
Jefferson City, MO 65101

Anthony Marquez
First Asst. Attorney General
COLORADO PUBLIC UTILITIES COMM.
1580 Logan Street
Office Level 2
Denver, CO 80203

Randolph J. May
Elizabeth C. Buckingham
SUTHERLAND, ASBILL & BRENNAN
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2404
Attorneys for ADVANCED
TECHNOLOGIES CELLULAR
TELECOMMUNICATIONS, INC.

Paul Rodgers
General Counsel
Charles D. Gray
Assistant General Counsel
James Bradford Ramsey
Dep. Asst. General Counsel
NATIONAL ASSOCIATION OF
REGULATORY UTILITY
COMMISSIONERS
1102 ICC Building, P.O. Box 684
Washington, D.C. 20044

Kenneth F. Melley, Jr.
Director-Regulatory Affairs
U.S. LONG DISTANCE, INC.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Donald L. Howell, III
Deputy Attorney General
IDAHO PUBLIC UTILITIES COMM.
P. O. Box 83720
Boise, ID 83720

Jean L. Kiddoo
Ann P. Morton
Swidler & Berlin, Chtd.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Counsel for CLEARTEL
COMMUNICATIONS; AMER. INMATE
COMMUNICATIONS, INC.

Steven E. Swenson
TELTRUST, INC.
221 N. Charles Lindbergh Dr.
Salt Lake City, UT 84116

James D. Heflinger
Vice President & General
Counsel
LITEL TELECOMMUNICATIONS
CORPORATION
d/b/a LCI INTERNATIONAL
4650 Lakehurst Court
Dublin, OH 43017

Judith St. Ledger-Roty
John W. Hunter
Reed, Smith, Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Counsel for INTELLICALL
COMPANIES

Ann V. MacClintock
Vice President-Reg. Affairs
The SOUTHERH NEW ENGLAND
TELEPHONE COMPANY
227 Church Street, 4th Fl.
New Haven, CT 06510

Nanci Adler
TECHNOLOGIES MANAGEMENT, INC.
P.O. Drawer 200
Winter Park, FL 32790
Consultant to Operator Service
Company

Mitchell F. Brecher
Donelan Cleary Wood &
Maser, P.C.
1275 K Street, N.W.
Suite 850
Washington, D.C. 20005
Counsel for ONCOR
COMMUNICATIONS

Brad E. Mutschelknaus
Ann M. Plaza
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Attorneys for AMERITEL
PAY PHONES, INC.

Charles D. Cosson
Stephen G. Kraskin
Attorney for U.S. INTELCO
NETWORKS, INC.
2120 L Street, N.W.
Suite 300
Washington, D.C. 20037

Perry R. Owen
OWEN'S PUBLIC FAX & PHONE
P.O. Box 60474
Sacramento, CA 95860

Thomas M. Rice
Chief Financial Officer
PRAIRIE CORRECTIONAL FACILITY
445 S. Munsterman
Appleton, MN 56208

Michael Scott
Chief Executive Officer
CMS
731 Walker Road, Suite H-2
Great Falls, VA 22066

Ebert Mednicoff
President
NEVADA PAYPHONE ASSOCIATION
4620 S. Arville
Suite H
Las Vegas, NV 89103

Vincent Townsend, President
PAY-TEL COMMUNICATIONS, INC.
P. O. Box 8179
Greensboro, NC 27419

Angela B. Green
FLORIDA PUBLIC TELECOMMUNI-
CATIONS ASSOCIATION, INC.
315 S. Calhoun Street, #710
Tallahasse, FL 32301

Susan M. Shanaman
21 North 4th Street
Harrisburg, PA 17101
COUNSEL FOR CENTRAL ATLANTIC
PAYPHONE ASSOCIATION

Glenn B. Manishin
Neil S. Ende
Blumenfeld & Cohen
1615 M Street, N.W., #700
Washington, D.C. 20036

Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Avenue, NW
Washington, D.C. 20044
COUNSEL FOR ANCHORAGE TELEPHONE COMPANY

William D. Baskett, III
John K. Rose
CINCINNATI BELL TELEPHONE CO.
2500 PNC Center
201 E. Fifth Street
Cincinnati, OH 45202

GVNW Inc./Management
P.O. Box 25969
Colorado Springs, CO 80936

James V. Troup
Arter & Hadden
1801 K Street, N.W.
Suite 400K
Washington, D.C. 20006
COUNSEL FOR IOWA NETWORK SERVICES, INC.

David Cosson
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Cindy Z. Schonhaut, Esq.
MFS COMMUNICATIONS CO., INC.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

J. Manning Lee
Sr. Regulatory Counsel
TELEPORT COMMUNICATIONS GROUP
2 Teleport Drive
Staten Island, NY 10311

Richard J. Metzger
Pierson & Tuttle
1200 19th Street, N.W.
Suite 607
Washington, D.C. 20036
Counsel for ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

Monique Brynes
Technologies Management, Inc.
P.O. Drawer 200
Winter Park, FL 32790
CONSULTANT FOR OSIRIS CORP.

Walter Sapronov
Charles A. Hudak
Gerry, Friend & Sapronov
Suite 1450
Three Ravinia Drive
Atlanta, GA 30346
ATTORNEYS FOR INTERLINK TELECOMMUNICATIONS, INC.

Amy S. Gross
AMERICAN NETWORK EXCHANGE, INC.
101 Park Avenue, Suite 2507
New York, NY 10178

Douglas E. Neel
Vice President
Regulatory Affairs
MESSAGE-PHONE, INC.
5910 N. Central Expressway
Suite 1575
Dallas, TX 75206

Paul C. Besozzi
Besozzi, Gavin & Craven
1908 L Street, N.W.
Suite 200
Washington, D.C. 20036
COUNSEL FOR POLAR COMMUNICATIONS CORP. & DIGITAL TECHNOLOGIES, INC.

Charles H. Helein
General Counsel
Helein & Waysdorf, P.C.
Suite 550
1850 M Street, N.W.
Washington, D.C. 20036

Martin W. Bercovia
Keller & Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
COUNSEL FOR WATERWAY COMMUNICATIONS SYSTEM, INC.

Branson Telephone
P.O. 1944
Branson, MO 65615

Kellie Phillips
Director of Operator Services
CALL AMERICA BUSINESS COMMUNICATIONS
4251 South Higuera
San Luis Obispo, CA 93401

Marianne A. Townsend
Director, Operator Systems & Regulatory
CONQUEST OPERATOR SERVICES CORPORATION
5500 Frantz Road
Suite 125
Dublin, OH 43017

Kathy L. Shobert
Director, Federal Regulatory Affairs
GENERAL COMMUNICATION, INC.
901 15th Street, N.W.
Suite 900
Washington, D.C. 20005

Donald G. Raider
PARK INN INTERNATIONAL
339 Jefferson Road
Parsippany, NJ 07054

Debra Lagapa
LEVINE, LAGAPA & BLOCK
1200 19th Street, N.W. #602
Washington, D.C. 20036
Counsel for MasterCard Int'l

James Gillmore, III
Attorney General
COMMONWEALTH OF VIRGINIA
Supreme Court Building
101 North Eighth Street
Richmond, VA 23219

William J. Cowan
General Counsel
NEW YORK STATE DEPARTMENT OF PUBLIC SERVICES
Three Empire State Plaza
Albany, NY 12223